

LEE LITIGATION GROUP, PLLC

30 EAST 39TH STREET, SECOND FLOOR

NEW YORK, NY 10016

TEL: 212-465-1180

FAX: 212-465-1181

INFO@LEELITIGATION.COM

WRITER'S DIRECT: 212-465-1124
taimur@leelitigation.com

September 11, 2017

Via ECF

Hon. Lisa Margaret Smith, U.S.M.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Zavala Artiega v. Griffin Organics, Inc., et al.*
Case No. 16-cv-6613 (LMS)

Dear Judge Smith:

We are counsel to Plaintiff. We respectfully submit this request for two-week extension of the briefing schedule for Plaintiff's contemplated motion to enforce the settlement entered into by the parties following class mediation. This is the first request for extension of this deadline. Defendants have advised that they consent to the proposed extension of the briefing schedule (as set forth below), if the Court will grant such extension:

Plaintiff's Motion (Originally Due By **Sept. 15, 2017**)
Proposed Deadline: **Sept. 29, 2017**

Defendants' Opposition (Originally Due By **Oct. 13, 2017**)
Proposed Deadline: **Oct. 27, 2017**

Plaintiff's Reply (Originally Due By **October 23, 2017**)
Proposed Deadline: **November 6, 2017**

We respectfully request this brief, consented extension of time because of our conflicting commitments. Specifically, I am undergoing a medical procedure this week and consequently will be unavailable to finalize Plaintiff's motion papers. My colleagues Mr. Lee and Ms. Seelig are also unavailable this week, due to personal obligations, as well as appearances and deadlines in other pending cases that cannot be adjourned.

We thank the Court for considering this matter.

Respectfully submitted,

/s/ Taimur Alamgir

Taimur Alamgir, Esq.

cc: All Counsel via ECF